

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR



December 5, 2003

201-14880

Mr. Michael O. Leavitt
Administrator
U.S. Environmental Protection Agency
P. O. Box 1473
Merrifield, VA 22116

RE: Ethylbenzene Panel Test Plan for Polyethylbenzene Bottoms (CAS Number 68987-42-8)

Dear Mr. Leavitt:

The Ethylbenzene Panel of the American Chemistry Council submits this test plan for Polyethylbenzene Bottoms (CAS Number 68987-42-8) under the High Production Volume (HPV) Challenge Program.

In preparing this test plan, the Panel has given careful consideration to the principles contained in the letter EPA sent to all HPV Challenge Program participants on October 14, 1999. The Panel has conducted a thorough review of the published literature and searched internally for all existing data relevant to this CAS number. In analyzing the adequacy of existing data, the Panel has conducted a thoughtful, qualitative analysis rather than a rote checklist approach. In doing this, the Panel believes it has complied with the principles contained in the October 14, 1999 letter.

If you have any questions, please contact Elizabeth Moran, Manager of the Ethylbenzene Panel at 301 924 2006 or Elizabeth_Moran@americanchemistry.com.

Sincerely yours,

cc: R. Hefter, EPA
S. Russell, ACC
J. Keith, ACC

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